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8 1918 Eighth Avenue, Suite 3300
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10 *Interim Lead Counsel for*
11 *Indirect Purchaser Plaintiffs*

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 IN RE OPTICAL DISK DRIVE PRODUCTS
17 ANTITRUST LITIGATION

No. 3:10-md-2143 RS (JCS)

18 DECLARATION OF SHANA E.
19 SCARLETT IN OPPOSITION TO
20 DEFENDANTS' JOINT MOTION FOR
21 SUMMARY JUDGMENT

22 Date: September 26, 2017
23 Time: 9:00 a.m.
24 Dept: Courtroom 3, 17th Floor
25 Judge: Hon. Richard Seeborg

26 DATE ACTION FILED: Oct. 27, 2009

24 This Document Relates to:
25 ALL INDIRECT PURCHASER ACTIONS
26

27 **REDACTED VERSION**
28

I, Shana E. Scarlett, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California in the above-titled litigation. I am a partner with the law firm of Hagens Berman Sobol Shapiro LLP, counsel of record for the indirect purchaser plaintiffs in the above-titled action. Based on personal knowledge or discussions with counsel in my firm of the matters stated herein, if called upon, I could and would competently testify thereto.

2. Attached hereto are true and correct copies of the following exhibits:

EX. NO.	DESCRIPTION
1	Pursuant to Federal Rule of Evidence 1006, the attached chart reflects communications between three participants in the conspiracy, JC Lim of PLDS, Eugene Yang of HLDS, and Kenny Lee of Samsung/TSST-Korea. The phone records summarized in the chart are voluminous (several hundred pages), and these records cannot be conveniently analyzed in court. The chart is based on phone records that are admissible in evidence based on deposition testimony from phone company representatives and production of the phone records from the defendants' own files. All of the phone records have been produced to the defendants during the course of this litigation. The chart was created at my direction by staff at Hagens Berman.
2	Pursuant to Federal Rule of Evidence 1006, the attached chart reflects communications between three participants in the conspiracy, JC Lim of PLDS, Eugene Yang of HLDS, and Kenny Lee of Samsung/TSST-Korea. The phone records summarized in the chart are voluminous (several hundred pages), and these records cannot be conveniently analyzed in court. The chart is based on phone records that are admissible in evidence based on deposition testimony from phone company representatives and production of the phone records from the defendants' own files. All of the phone records have been produced to the defendants during the course of this litigation. This chart is identical to the chart attached as Exhibit 1, but includes information contained in Plaintiff HP Inc.'s Eighth Supplemental Objections and Responses to Defendant Panasonic Corporation's First Set of Interrogatories, regarding the timing of certain procurement events. The twenty-two events defendants acknowledge as agreements are highlighted in red. The chart was created at my direction by staff at Hagens Berman.
3	Plaintiff HP Inc.'s Eighth Supplemental Objections and Responses to Defendant Panasonic Corporation's First Set of Interrogatories, served January 13, 2017 in the <i>In re Optical Disk Drive Products Antitrust Litigation</i> .
4	Document Bates-numbered HLDS_CIV00007811-840, produced in the above-captioned litigation by the HLDS defendants.
5	Document Bates-numbered HLDS_CIV00007841-864, produced in the above-captioned litigation by the HLDS defendants.
6	Document Bates-numbered HLDS_CIV00009865-880, produced in the above-

EX. NO.	DESCRIPTION
	captioned litigation by the HLDS defendants.
7	Document Bates-numbered HLDS_CIV00010002-23, produced in the above-captioned litigation by the HLDS defendants.
8	Document Bates-numbered HLDS_CIV00010189-208, produced in the above-captioned litigation by the HLDS defendants.
9	Document Bates-numbered HLDS_CIV00020631-662, produced in the above-captioned litigation by the HLDS defendants.
10	Document Bates-numbered HLDS_CIV00020663-692, produced in the above-captioned litigation by the HLDS defendants.
11	Document Bates-numbered HLDS_CIV00020693-20716, produced in the above-captioned litigation by the HLDS defendants.
12	Document Bates-numbered HLDS_CIV00020755-770, produced in the above-captioned litigation by the HLDS defendants.
13	Document Bates-numbered HLDS_CIV00020806-817, produced in the above-captioned litigation by the HLDS defendants.
14	Document Bates-numbered HLDS_CIV00030864-872, produced in the above-captioned litigation by the HLDS defendants.
15	Document Bates-numbered HLDS_CIV00030873-881, produced in the above-captioned litigation by the HLDS defendants.
16	Document Bates-numbered HLDS_CIV00030882-88, produced in the above-captioned litigation by the HLDS defendants.
17	Document Bates-numbered HLDS_CIV00030896-904, produced in the above-captioned litigation by the HLDS defendants.
18	Document Bates-numbered HLDS_CIV00030905-912, produced in the above-captioned litigation by the HLDS defendants.
19	Document Bates-numbered HLDS_CIV00030913-922, produced in the above-captioned litigation by the HLDS defendants.
20	Document Bates-numbered HLDS_CIV00030931-938, produced in the above-captioned litigation by the HLDS defendants.
21	Document Bates-numbered HLDS_CIV00030939-945, produced in the above-captioned litigation by the HLDS defendants.
22	Document Bates-numbered HLDS_CIV00030954-962, produced in the above-captioned litigation by the HLDS defendants.
23	Document Bates-numbered HLDS_CIV00030971-981, produced in the above-captioned litigation by the HLDS defendants.
24	Document Bates-numbered HLDS_CIV00030982-992, produced in the above-captioned litigation by the HLDS defendants.
25	Document Bates-numbered HLDS_CIV00031005-1012, produced in the above-captioned litigation by the HLDS defendants.
26	Document Bates-numbered HLDS_CIV00031013-1024, produced in the above-captioned litigation by the HLDS defendants.
27	Document Bates-numbered HLDS_CIV00031033-1040, produced in the above-captioned litigation by the HLDS defendants.
28	Document Bates-numbered HLDS_CIV00031041-1050, produced in the above-captioned litigation by the HLDS defendants.

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29	Document Bates-numbered HLDS_CIV00031051-1062, produced in the above-captioned litigation by the HLDS defendants.
30	Document Bates-numbered HLDS_CIV00031063-1071, produced in the above-captioned litigation by the HLDS defendants.
31	Document Bates-numbered HLDS_CIV00031081-1090, produced in the above-captioned litigation by the HLDS defendants.
32	Document Bates-numbered HLDS_CIV00031125-136, produced in the above-captioned litigation by the HLDS defendants.
33	Document Bates-numbered HLDS_CIV00031137-147, produced in the above-captioned litigation by the HLDS defendants.
34	Document Bates-numbered HLDS_CIV00031148-156, produced in the above-captioned litigation by the HLDS defendants.
35	Document Bates-numbered HLDS_CIV00031166-175, produced in the above-captioned litigation by the HLDS defendants.
36	Document Bates-numbered HLDS_CIV00031176-183, produced in the above-captioned litigation by the HLDS defendants.
37	Document Bates-numbered HLDS_CIV00031201-206, produced in the above-captioned litigation by the HLDS defendants.
38	Document Bates-numbered HLDS_CIV00031208-1308, produced in the above-captioned litigation by the HLDS defendants.
39	Document Bates-numbered HLDS_CIV00031316-1587, produced in the above-captioned litigation by the HLDS defendants.
40	Document Bates-numbered HLDS_CIV00032156-165, produced in the above-captioned litigation by the HLDS defendants.
41	Document Bates-numbered HLDS_CIV00032166-174, produced in the above-captioned litigation by the HLDS defendants.
42	Document Bates-numbered HLDS_CIV00032175-184, produced in the above-captioned litigation by the HLDS defendants.
43	Document Bates-numbered HLDS_CIV00032223-231, produced in the above-captioned litigation by the HLDS defendants.
44	Document Bates-numbered HLDS_CIV00032232-240, produced in the above-captioned litigation by the HLDS defendants.
45	Document Bates-numbered HLDS_CIV00032241-250, produced in the above-captioned litigation by the HLDS defendants.
46	Document Bates-numbered HLDS_CIV00032251-260, produced in the above-captioned litigation by the HLDS defendants.
47	Document Bates-numbered HLDS_CIV00032261-271, produced in the above-captioned litigation by the HLDS defendants.
48	Document Bates-numbered HLDS_CIV00032272-281, produced in the above-captioned litigation by the HLDS defendants.
49	Document Bates-numbered HLDS_CIV00032282-292, produced in the above-captioned litigation by the HLDS defendants.
50	Document Bates-numbered HLDS_CIV00032293-98, produced in the above-captioned litigation by the HLDS defendants.
51	Document Bates-numbered HLDS_CIV00032299-2305, produced in the above-

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	captioned litigation by the HLDS defendants.
52	Document Bates-numbered HLDS_CIV00032306-318, produced in the above-captioned litigation by the HLDS defendants.
53	Document Bates-numbered HLDS_CIV00032319-326, produced in the above-captioned litigation by the HLDS defendants.
54	Document Bates-numbered HLDS_CIV00032327-340, produced in the above-captioned litigation by the HLDS defendants.
55	Document Bates-numbered HLDS_CIV00032341-49, produced in the above-captioned litigation by the HLDS defendants.
56	Document Bates-numbered HLDS_CIV00032350-56, produced in the above-captioned litigation by the HLDS defendants.
57	Document Bates-numbered HLDS_CIV00032357-367, produced in the above-captioned litigation by the HLDS defendants.
58	Document Bates-numbered HLDS_CIV00032368-377, produced in the above-captioned litigation by the HLDS defendants.
59	Document Bates-numbered HLDS_CIV00032378-384, produced in the above-captioned litigation by the HLDS defendants.
60	Document Bates-numbered HLDS_CIV00032385-395, produced in the above-captioned litigation by the HLDS defendants.
61	Document Bates-numbered HLDS_CIV00032396-2405, produced in the above-captioned litigation by the HLDS defendants.
62	Document Bates-numbered HLDS_CIV00032406-417, produced in the above-captioned litigation by the HLDS defendants.
63	Document Bates-numbered HLDS_CIV00036854-877, produced in the above-captioned litigation by the HLDS defendants.
64	Document Bates-numbered HLDS_CIV00036878-6901, produced in the above-captioned litigation by the HLDS defendants.
65	Document Bates-numbered HLDS_CIV00036902-923, produced in the above-captioned litigation by the HLDS defendants.
66	Document Bates-numbered HLDS_CIV00036924-947, produced in the above-captioned litigation by the HLDS defendants.
67	Document Bates-numbered HLDS_CIV0006948-971, produced in the above-captioned litigation by the HLDS defendants.
68	Document Bates-numbered HLDS_CIV00036972-998, produced in the above-captioned litigation by the HLDS defendants.
69	Document Bates-numbered HLDS_CIV00037004, produced in the above-captioned litigation by the HLDS defendants.
70	Document Bates-numbered HLDS_CIV003647691-7710, produced in the above-captioned litigation by the HLDS defendants.
71	Document Bates-numbered HLDS_CIV003647711-732, produced in the above-captioned litigation by the HLDS defendants.
72	Document Bates-numbered HLDS_CIV003647733-758, produced in the above-captioned litigation by the HLDS defendants.
73	Document Bates-numbered HLDS_CIV003647759-782, produced in the above-captioned litigation by the HLDS defendants.

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74	Document Bates-numbered HLDS_CIV003647783-7807, produced in the above-captioned litigation by the HLDS defendants.
75	Document Bates-numbered HLDS_CIV0036477808-833, produced in the above-captioned litigation by the HLDS defendants.
76	Document Bates-numbered HLDS_CIV003647834-857, produced in the above-captioned litigation by the HLDS defendants.
77	Document Bates-numbered HLDS_CIV003647858-879, produced in the above-captioned litigation by the HLDS defendants.
78	Document Bates-numbered HLDS_CIV003647880-7905, produced in the above-captioned litigation by the HLDS defendants.
79	Document Bates-numbered HLDS_CIV003647906-929, produced in the above-captioned litigation by the HLDS defendants.
80	Document Bates-numbered HLDS_CIV003647930-955, produced in the above-captioned litigation by the HLDS defendants.
81	Document Bates-numbered HLDS_CIV003647956-983, produced in the above-captioned litigation by the HLDS defendants.
82	Document Bates-numbered HLDS_CIV003647984-8009, produced in the above-captioned litigation by the HLDS defendants.
83	Document Bates-numbered HLDS_CIV003648010-8035, produced in the above-captioned litigation by the HLDS defendants.
84	Document Bates-numbered HLDS_CIV003648036-8055, produced in the above-captioned litigation by the HLDS defendants.
85	Document Bates-numbered HLDS_CIV003648056-8077, produced in the above-captioned litigation by the HLDS defendants.
86	Document Bates-numbered HLDS_CIV003648078-8103, produced in the above-captioned litigation by the HLDS defendants.
87	Document Bates-numbered HLDS_CIV003648104-131, produced in the above-captioned litigation by the HLDS defendants.
88	Document Bates-numbered HLDS_CIV003648132-155, produced in the above-captioned litigation by the HLDS defendants.
89	Document Bates-numbered HLDS_CIV003648156-183, produced in the above-captioned litigation by the HLDS defendants.
90	Document Bates-numbered HLDS_CIV003648184-8209, produced in the above-captioned litigation by the HLDS defendants.
91	Document Bates-numbered ODDCIV-000359254-291, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
92	Document Bates-numbered ODDCIV-000359292-9357, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
93	Document Bates-numbered ODDCIV-000359358-394, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
94	Document Bates-numbered ODDCIV-000359395-9429, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips

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	defendants.
95	Document Bates-numbered ODDCIV-000359487-496, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
96	Document Bates-numbered ODDCIV-000359497-9509, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
97	Document Bates-numbered ODDCIV-000359510-523, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
98	Document Bates-numbered ODDCIV-000359524-539, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
99	Document Bates-numbered ODDCIV-000359540-47, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
10	Document Bates-numbered ODDCIV-004105207-210, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
101	Document Bates-numbered ODDCIV-004105211-215, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
102	Document Bates-numbered ODDCIV-004105216-218, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
103	Document Bates-numbered ODDCIV-004105224-27, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
104	Document Bates-numbered ODDCIV-004105236-39, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
105	Document Bates-numbered ODDCIV-004105240-45, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
106	Document Bates-numbered ODDCIV-004105252-58, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
107	Document Bates-numbered ODDCIV-004105265-268, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
108	Document Bates-numbered ODDCIV-004105269-275, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
109	Document Bates-numbered ODDCIV-004105276-79, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips

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	defendants.
110	Document Bates-numbered ODDCIV-004105304-311, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
111	Document Bates-numbered ODDCIV-004105312-315, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
112	Document Bates-numbered ODDCIV-004105316-323, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
113	Document Bates-numbered ODDCIV-004105327-358, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
114	Document Bates-numbered ODDCIV-004105359, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
115	Document Bates-numbered ODDCIV-004105367, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
116	Document Bates-numbered ODDCIV-004105369-5400, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
117	Document Bates-numbered ODDCIV-005384136-151, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
118	Document Bates-numbered ODDCIV-005384218-222, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
119	Document Bates-numbered ODDCIV-005384261-268, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
120	Document Bates-numbered ODDCIV-005385838-840, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
121	Document Bates-numbered ODDCIV-005385903-908, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
122	Document Bates-numbered ODDCIV-005385909-911, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
123	Document Bates-numbered ODDCIV-005385942-956, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
124	Document Bates-numbered ODDCIV-005418010-8016, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips

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	defendants.
125	Document Bates-numbered ODDCIV-005418227-231, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
126	Document Bates-numbered ODDCIV-005424128-143, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
127	Document Bates-numbered ODDCIV-005424170-189, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
128	Document Bates-numbered ODDCIV-005424339-354, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
129	Document Bates-numbered ODDCIV-005424377-384, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
130	Document Bates-numbered ODDCIV-005424385-389, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
131	Document Bates-numbered ODDCIV-005424390-4401, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
132	Document Bates-numbered ODDCIV-005424402-405, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
133	Document Bates-numbered ODDCIV-005424406-415, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
134	Document Bates-numbered ODDCIV-005424421-436, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
135	Document Bates-numbered ODDCIV-005424472-485, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
136	Document Bates-numbered ODDCIV-005424548-553, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
137	Document Bates-numbered ODDCIV-005479492-495, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
138	Document Bates-numbered ODDCIV-005495459-461, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
139	Document Bates-numbered ODDCIV-005495472-475, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips

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	defendants.
140	Document Bates-numbered ODDCIV-005557730-759, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
141	Document Bates-numbered ODDCIV-005557760-65, produced in the above-captioned litigation and designated "CONFIDENTIAL" by the Philips defendants.
142	Document Bates-numbered PNA-CIV 0000080493-503, produced in the above-captioned litigation by the Panasonic defendants.
143	Document Bates-numbered PNA-CIV 0000094362-372, produced in the above-captioned litigation by the Panasonic defendants.
144	Document Bates-numbered PNA-CIV 0000180531-36, produced in the above-captioned litigation by the Panasonic defendants.
145	Document Bates-numbered SEC-ODD-00002099-2134, produced in the above-captioned litigation and designated "CONFIDENTIAL – RESTRICTED" by the Samsung defendants.
146	Document Bates-numbered SEC-ODD-00002135-164, produced in the above-captioned litigation and designated "CONFIDENTIAL – RESTRICTED" by the Samsung defendants.
147	Document Bates-numbered SEC-ODD-00002165-2202, produced in the above-captioned litigation and designated "CONFIDENTIAL – RESTRICTED" by the Samsung defendants.
148	Document Bates-numbered SEC-ODD-00003013-3071, produced in the above-captioned litigation and designated "CONFIDENTIAL – RESTRICTED" by the Samsung defendants.
149	Document Bates-numbered SOA-DOJ-1-09048-9146, produced in the above-captioned litigation and designated "HIGHLY CONFIDENTIAL" by the Sony defendants.
150	Document Bates-numbered SOA-DOJ-1-09410-9555, produced in the above-captioned litigation and designated "HIGHLY CONFIDENTIAL" by the Sony defendants.
151	Document Bates-numbered SOA-DOJ-1-09556-9692, produced in the above-captioned litigation and designated "HIGHLY CONFIDENTIAL" by the Sony defendants.
152	Document Bates-numbered SOA-DOJ-1-09694-9828, produced in the above-captioned litigation and designated "HIGHLY CONFIDENTIAL" by the Sony defendants.
153	Document Bates-numbered SOA-DOJ-1-09856-9988, produced in the above-captioned litigation and designated "HIGHLY CONFIDENTIAL" by the Sony defendants.
154	Document Bates-numbered SOA-DOJ-1-10015-144, produced in the above-captioned litigation and designated "HIGHLY CONFIDENTIAL" by the Sony defendants.
155	Document Bates-numbered SOA-DOJ-1-10249-374, produced in the above-captioned litigation and designated "HIGHLY CONFIDENTIAL" by the Sony

EX. NO.	DESCRIPTION
	defendants.
156	Document Bates-numbered SOA-DOJ-1-10387-508, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
157	Document Bates-numbered SOA-DOJ-1-10509-637, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
158	Document Bates-numbered SOA-DOJ-1-10653-787, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
159	Document Bates-numbered SOA-DOJ-1-10808-950, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
160	Document Bates-numbered SOA-DOJ-1-11254-1404, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
161	Document Bates-numbered SOA-DOJ-1-11405-1546, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
162	Document Bates-numbered SOA-DOJ-1-11547-1693, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
163	Document Bates-numbered SOA-DOJ-1-11935-12083, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
164	Document Bates-numbered SOA-DOJ-1-12092-2233, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
165	Document Bates-numbered SOA-DOJ-1-12252-2234, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
166	Document Bates-numbered SOA-DOJ-1-14514-4839, produced in the above-captioned litigation and designated “HIGHLY CONFIDENTIAL” by the Sony defendants.
167	Document Bates-numbered SSI-ODD-000000001-475, produced in the above-captioned litigation and designated “CONFIDENTIAL – RESTRICTED” by the Samsung defendants.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 11th day of August, 2017 at Berkeley, California.

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4 /s/ Shana E. Scarlett
5 SHANA E. SCARLETT
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